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September 9, 2021

The Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Rebecca Linke, et al.  
20 CR 160 (MKV)

Dear Judge Vyskocil:

I represent Defendant Rebecca Linke, and submit this letter motion on her behalf seeking a modification of the travel limits of her bail<sup>1</sup> as set forth below. Neither the Government nor the Office of Pretrial Services opposes the motion.

I respectfully request that her travel limitations be extended to permit her to travel with her husband for a weekend camping trip in Ocean City, Maryland. The dates of her requested travel are 9/16-9/19.

The Court denied the prior application from Dr. Linke making this same request on April 12, 2021. (ECF No. 350). I nevertheless make the motion again, hoping that a more elaborate explanation might induce the Court to approve the request in this instance. Dr. Linke and her husband have spent weekends in Ocean City for as long as they have been a couple, which is to say five years. At first they were annual, and for the last three years they were semi-annual; they became something of a tradition. This would be their first trip there since September 2019 (pre-COVID-19), and—more importantly—their first since their wedding in November 2020. It is important enough to them to ask the Court for again, notwithstanding its earlier denial of the same relief.

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<sup>1</sup> Ms. Linke was released on the day of her arrest, March 9, 2020, on a \$100,000 Personal Recognizance Bond cosigned by her parents. Her travel limits are the Southern and Eastern Districts of New York, and the District of New Jersey, where she lives. Ms. Linke has been fully compliant with all bail conditions at all times.

Assistant United States Attorney Andrew Adams, Pretrial Services Officer Rena Bolin (SDNY) and Pretrial Services Officer Lura Jenkins (DNJ) all consent to the application. If granted, Dr. Linke's precise itinerary and destination will be provided to Pretrial in advance.

I therefore respectfully request that the motion be granted.


Sincerely,



David Wikstrom

**The request is GRANTED. The Court notes that the bail conditions and restrictions currently in place are the conditions to which the parties stipulated and agreed (*i.e.* these are the conditions that the parties believed were the least restrictive means to minimize a risk of flight and protect the community). To date, Ms. Linke has been compliant with her conditions, and both the Government and Pretrial Services consent to this temporary modification. In light of that, the Court is granting this one-time modification. Ms. Linke is directed to provide Pretrial Services with her travel itinerary and check in with her assigned pretrial services officer before leaving and upon her return. Ms. Linke and all other Defendants are on notice that they should not expect that applications to modify bail conditions routinely will be granted.**

Date: 9/16/2021  
New York, New York



Mary Kay Vyskocil  
United States District Judge